

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

**RADIANCE CAPITAL RECEIVABLES
EIGHTEEN, LLC**

Plaintiff,

vs.

SNEZANA STROTHMANN

Defendant.

Case No. 4:16-cv-01196-DGK

JOINT MOTION FOR EXTENSION OF TIME FOR DISCOVERY

Plaintiff Radiance Capital Receivables Eighteen, LLC (“Plaintiff”) and defendant Snezana Strothmann (“Defendant” or “Strothmann”), by counsel, jointly move for an extension of time of discovery deadlines, and support of such Motion sets forth:

1. The parties have discovery requests and/or depositions still pending which are scheduled to be complete by the original discovery completion deadline of June 30, 2017.

2. In order that the parties may have time to evaluate the information provided in these requests and/or depositions, confer and, if necessary, timely file discovery motions, the parties jointly move the Court for the extension of discovery deadlines, as follows:

Discovery Motion Deadline: From June 16, 2017 to July 7, 2017

Completion of Discovery: From June 30, 2017 to and July 14, 2017

3. No prior extensions of discovery deadlines have been requested nor granted, though the parties jointly requested an extension of time to investigate other potential resolutions of Plaintiff’s Verified Applications for Default against other defendants besides Strothmann, *Dkt Nos.* 11-13, made moot by the insolvency filing and subsequent dismissal of the other defendants.

Wherefore, the parties respectfully request the extension of these discovery deadlines.

Respectfully submitted,

KENNYHERTZ PERRY, LLC

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**ATTORNEYS FOR DEFENDANT
SNEZANA STROTHMANN**

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of June, 2017, I electronically filed the foregoing document with the United States District Court for the Western District of Missouri by using the CM/ECF system. I certify that the following parties or their counsel of record are registered as ECF Filers and that they will be served by the CM/ECF system: Daniel Stuart Simon, dsimon@evans-dixon.com and Kelly A. Ricke, kricke@evans-dixon.com.

/s/ Marc S. Wilson_____